

Exhibit 2

International Paper's Notice of Rule 30(b)(6)
Deposition of Plaintiffs Georgia Pacific Consumer
Products, et al.
(March 13, 2012)

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GEORGIA PACIFIC CONSUMER PRODUCTS,)
FORT JAMES CORPORATION, and GEORGIA-)
PACIFIC LLC,)
)
Plaintiffs,)
) Civil Action No. 1:11-cv-00483-RJJ
v.)
) Assigned to: Hon. Robert J. Jonker
NCR CORPORATION, INTERNATIONAL)
PAPER CO., and WEYERHAEUSER)
COMPANY,)
)
Defendants.)
)

**INTERNATIONAL PAPER'S NOTICE OF RULE 30(b)(6) DEPOSITION OF
PLAINTIFFS GEORGIA PACIFIC CONSUMER PRODUCTS, ET AL.**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), International Paper Company (“International Paper”) will take the deposition of Plaintiffs Georgia Pacific Consumer Products, Fort James Corporation, and Georgia Pacific LLC (collectively, “GP”) at a location to be mutually agreed upon for the convenience of the corporate representative(s), on March 29, 2012 at 9:00 a.m., before a duly authorized officer certified to administer oaths and take depositions. The deposition will be recorded by stenographic and/or videographic means and will be taken for the purpose of discovery, for use as evidence at any hearing or trial, and for any other purposes authorized by law and will continue from day to day until completed.

Pursuant to Rule 30(b)(6) International Paper requests that GP designate a person or persons to testify about information known or reasonably available to GP regarding the subject matters listed on the attached Exhibit A.

International Paper requests that GP provide a written designation of the name(s) and position(s) of the persons who will testify on behalf of GP and, for each person so designated, the matters listed on Exhibit A as to which he or she will testify.

Dated: March 13, 2012

s/Michael Dominic Meuti

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International Paper Company

EXHIBIT A

DEFINITIONS

1. “Bryant Mill” refers to the industrial complex located in Kalamazoo, Michigan that was previously engaged in manufacturing paper referred to in Paragraph 95 of the FAC.
2. “CCP” refers to NCR’s carbonless-copy-paper product, sometimes known as “NCR Paper” or “No Carbon Required” paper, including any component thereof (e.g., emulsion, capsules, Aroclor, base paper, CF, CFB, and/or CB).
3. “CCP broke and/or trim” refers to byproducts of manufacturing carbonless copy paper containing PCBs. This term shall include the terms “CCP Coating Broke” and “CCP Converter Trim” as used in GP’s First Requests for Production of Documents to NCR.
4. “CCP post-consumer waste” refers to CCP that had been used and/or discarded by end users.
5. The term “including” means including, but not limited to.
6. “NCR” refers to Defendant NCR Corporation, including its subsidiaries, divisions, affiliates, and predecessors, their present or former partners, officers, directors, employees, or agents, and any other person acting or purporting to act on their behalf. The term specifically includes the former Appleton Coated Paper Company, the former Combined Paper Mills, Inc., and Systemedia.
7. “PCBs” refers to polychlorinated biphenyls, whether manufactured by Monsanto Company or any other entity.
8. The term “recovered fiber” refers to each of the following:
 - paper, paperboard, and fibrous materials from retail stores, office buildings and/or homes after they have passed through their end-use as a consumer item, including used corrugated boxes, old newspapers, old magazines, mixed waste paper, tabulating cards, and used cordage;

- all paper, paperboard, and fibrous materials that enter and are collected from municipal solid waste;
- residual dry paper and paperboard generated after the completion of the papermaking process, including (a) envelope cuttings, bindery trimmings, and other residual paper and paperboard resulting from printing, cutting, forming, and other converting operations; (b) bag, box, and carton manufacturing wastes; and (c) butt rolls, mill wrappers, and rejected unused stock;
- repulped finished paper and paperboard from obsolete inventories of paper and paperboard manufacturers, merchants, wholesalers, dealers, printers, converters, or others; and
- any paper scrap or trim generated in a paper mill prior to completion of the papermaking process.

However, “recovered fiber” shall be construed to exclude NCR broke and/or trim, as defined above.

9. The term “recycling” refers to the process(es) used to repulp, deink, bleach, clean, and/or wash any recovered fiber or NCR broke and/or trim as part of using that recovered fiber or NCR broke and/or trim to make new paper products.

10. The term “St. Regis” refers to St. Regis Paper Company.

TOPICS FOR EXAMINATION

1. The recycling or other use in paper production of CCP broke and/or trim at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation CCP received from brokers.

2. The recycling or other use in paper production of CCP broke and/or trim at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation CCP received from brokers.

3. The recycling or other use in paper production of recovered fiber containing PCBs at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation PCB-containing recovered fiber received from brokers.

4. The recycling or other use in paper production of recovered fiber containing PCBs at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation PCB-containing recovered fiber received from brokers.

5. The recycling or other use in paper production of CCP post-consumer waste at the Bryant Mill between November 8, 1946 and June 30, 1956, including without limitation CCP post-consumer waste received from brokers.

6. The recycling or other use in paper production of CCP post-consumer waste at the Bryant Mill between July 1, 1956 and August 5, 1966, including without limitation CCP post-consumer waste received from brokers.

7. The discharge of PCBs from the Bryant Mill in any manner from November 8, 1946 until June 30, 1956.

8. The discharge of PCBs from the Bryant Mill in any manner from July 1, 1956 until August 5, 1966.

9. Any other mill, facility or operation within, or in the vicinity of, the Site that GP contends was a “facility” (as defined in CERCLA) from which there was a “release” or “threatened release” (as such terms are defined in CERCLA) of PCBs and that was “owned” or “operated” (as such terms are defined in CERCLA) by International Paper or any predecessor in interest to International Paper.

10. Any other basis on which GP contends that International Paper is a liable party under CERCLA with respect to the Site.

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2012, I served the foregoing International Paper's Notice of 30(b)(6) Deposition of Plaintiffs Georgia Pacific Consumer Products, et al. by email upon the following counsel of record:

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s/Michael Dominic Meuti

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